

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Kostyantyn Bugarenko**

Debtor(s)

Case No. **19-11270**
Chapter **13**

MOTION TO APPOINT NEXT FRIEND

1. Debtor filed for Bankruptcy Protection on March 1, 2019. The Debtor filed said Bankruptcy Petition due to numerous creditors and lawsuit(s).
2. Debtor is currently incarcerated by Immigration and Customs Enforcement ("ICE") in York County Prison.
3. Counsel for debtor has been communicating with Debtor via mail, and through debtor's spouse, who has been most helpful during the pendency of this instant case.
4. The Bankruptcy Petition was mailed by counsel to Debtor for review and signatures, afterwhich said Petition was filed with the Court.
5. Debtor's counsel has been attempting with great difficulty and no success to schedule the Creditors' meeting at York County Prison. Debtor's counsel has sent letters to the prison, spoken with both debtor's immigration counsel, prison caseworker, the prison Administration office and Trustee Waterman's office (via email and phone calls).
6. Counsel for debtor was lead to believe that on January 8, 2020 (the date the Trustee's office scheduled the Creditors' Meeting for (about) the third time) that she had permission to conduct the Creditors' Meeting at the prison telephonically.
7. On the morning of January 8, 2020 counsel for debtor called the prison Administration office to double check that she can see her client and conduct the telephonic hearing and was told, for the first time, that no telephones were permitted in the prison, unless ICE grants special clearance for the use of the phone.
8. Court Administration called the Officer in charge of the visiting unit, whereby counsel was denied special clearance for said telephonic hearing.
9. Debtor has four (4) children who live at home, three minors and one son who is twenty (20) years old and a dependent parent. Debtor's Bankruptcy case is most important to him in an attempt to get his debts under control and support his dependents.
10. Debtor's spouse, Tatyana Bugarenko, requests to be debtor's "Next Friend" and act on behalf of debtor regarding this said Bankruptcy case.

11. Debtor's best interests will be served by the appointment of Mrs. Tatyana Bugarenko as his "Next Friend" because she is familiar with all of Debtor's finances, financial accounts, income and business.

WHEREFORE, the Debtor respectfully requests that Tatyana Bugarenko be appointed debtor's Next Friend for this Bankruptcy case.

Date: 1/21/2020

Respectfully submitted,
/s/Tova Weiss
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